

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE**

BRANDY HUDSON

Plaintiff,

Civil Action No.
1:11-cv-01384-JDB-egb

v.

LAW OFFICE OF L. RYAN COPELAND, P.C.,
LINDSAY RYAN COPELAND AND JOHN DOE(S)

Defendants.

APPLICATION FOR ENTRY OF DEFAULT JUDGMENT

Plaintiff hereby applies for the entry of default against Defendants, Law Office of L. Ryan Copeland, P.C. and Lindsay Ryan Copeland. Defendant Law Office of L. Ryan Copeland, P.C. was served with Plaintiff's Complaint via personal service on December 29, 2011. (*See* affidavit of service attached hereto as Exhibit A). Defendant Lindsay Ryan Copeland was served with Plaintiff's Complaint via personal service on December 29, 2011. (*See* affidavit of service attached hereto as Exhibit B). As of the date of this Motion, Defendants have not filed an Answer and has offered no explanation for their failure to answer the instant complaint. Accordingly, Plaintiff seeks default against Defendants in the amount of four thousand seven hundred nine dollars and eighty-five cents (\$4,709.85), representing statutory damages in the amount of one thousand dollars (\$1,000.00) pursuant to 15 U.S.C. §1692(k)(a)(2)(A). Plaintiff has incurred in excess of \$4,100.00 in attorney's fees to date. However, Plaintiff seeks only the

amount of three thousand dollars (\$3,000.00) in attorney's fees and seven hundred nine dollars and eighty-five cents (\$709.85) in court costs.

This sum is supported by the Affidavit of undersigned, attached hereto as Exhibit C.

Dated: February 20, 2012

Respectfully submitted,

Brandy Hudson
WEISBERG & MEYERS, LLC

By: s/Craig Ehrlich
Craig Ehrlich
Attorney for Plaintiff
Weisberg & Meyers, LLC
1448 Madison Avenue
Memphis, TN 38104
Telephone: (602) 445 9819
Facsimile: (866) 565 1327
Email: CEhrlich@AttorneysForConsumers.com

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on February 20, 2012, a true and correct copy of the foregoing document was filed by electronic means through the Court's ECF System. A copy of the foregoing was mailed to the following on this 20th day of February, 2012:

Law Office of L. Ryan Copeland, P.C.
c/o Lindsay Ryan Copeland
227 Niagara St.
Buffalo, NY 14201

By: s/Craig Ehrlich
Craig Ehrlich